Powell, Courtney

From:

Powell, Courtney

Sent:

Friday, August 19, 2022 2:42 PM

To:

Babchinetskaya, Izabella; Jonathan Irwin; aago@lawyerscommittee.org; Leckerman,

Jason; Gavin, Laura; Swaminathan, Lisa B.; Tianna Mays; Woody Glass

Cc:

Holkum, Laura

Subject:

RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Attachments:

Response_Haynes_1st RFPs-c.pdf; Response_Neiman_1st RFPs-c.pdf; Response_Stamp_

1st RFPs.pdf; Response_VB_1st RFPs.pdf

Attached please find copies of the responses to the discovery requests.

As discussed during the call, the individual Defendants do not have responsive documents. Any responsive documents would be those of the City. We are agreeable to producing those documents now, thereby negating the need for additional requests to the City.

You will also references to a protective order. This is needed in connection with the production of certain human resource type documents.

As stated, we would respectfully ask until next Friday to finalize the actual document production.

Thank you, Courtney

Courtney Powell Of Counsel Spencer Fane LLP

9400 N. Broadway Ext., Suite 600 | Oklahoma City, OK 73114

O 405.753.5915

cpowell@spencerfane.com | spencerfane.com

From: Babchinetskaya, Izabella <Babchinetskayal@ballardspahr.com>

Sent: Friday, August 19, 2022 9:37 AM

To: Powell, Courtney <cpowell@spencerfane.com>

Cc: Jonathan Irwin < Jonathan@wardglasslaw.com>; aago@lawyerscommittee.org; Leckerman, Jason

<LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B.

<SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass

<woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>;

Davies, Shannon <sdavies@spencerfane.com>

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

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Courtney,

Please confirm that you're still available for a 12:30 CST call. I will circulate a dial-in.

EXHIBIT 3

Thanks,

Izabella

From: Babchinetskaya, Izabella (Phila) Sent: Thursday, August 18, 2022 10:09 AM

To: 'Powell, Courtney' < cpowell@spencerfane.com>

Cc: Jonathan Irwin < Jonathan@wardglasslaw.com >; aago@lawyerscommittee.org; Leckerman, Jason (Phila) < LeckermanJ@ballardspahr.com >; Gavin, Laura (Phila) < gavinl@ballardspahr.com >; Swaminathan, Lisa B. (Phila)

<SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass

<woody@wardglasslaw.com>; Ferate, AJ <<u>AJFerate@spencerfane.com</u>>; Lester, Andy <alester@spencerfane.com>;

Davies, Shannon <sdavies@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

Because the original deadline for discovery responses was almost a month ago and given the impending class certification deadline, we expect defendants to produce documents that they do not object to by this Friday. If you anticipate this will be an issue, we'll coordinate our schedules to meet during one of the times you listed below.

Best, Izabella

From: Powell, Courtney < cpowell@spencerfane.com>

Sent: Wednesday, August 17, 2022 9:33 PM

To: Jonathan Irwin < <u>Jonathan@wardglasslaw.com</u>>; Babchinetskaya, Izabella (Phila)

<Babchinetskayal@ballardspahr.com>

Subject: Re: Hill et al. v. Town of Valley Brook, et al. - RFPs

↑ EXTERNAL

Jonathan & Izabella - I am waiting on final approval from our clients. I am told I will have it by Friday. If that is not acceptable, I can be available Friday between 10:00 - 1:00 CST or between 3:30 -5:00 CST. Courtney

Courtney Davis Powell, Attorney Spencer Fane LLP

9400 Broadway Ext., Ste. 600, Oklahoma City, Oklahoma 73114 **O** 405.844.9900

cpowell@spencerfane.com | spencerfane.com

From: Jonathan Irwin < Jonathan@wardglasslaw.com>

Sent: Tuesday, August 16, 2022 9:17 AM

To: Babchinetskaya, Izabella <<u>Babchinetskayal@ballardspahr.com</u>>; Powell, Courtney <<u>cpowell@spencerfane.com</u>>
Cc: <u>aago@lawyerscommittee.org</u> <<u>aago@lawyerscommittee.org</u>>; Leckerman, Jason <<u>LeckermanJ@ballardspahr.com</u>>; Gavin, Laura <<u>gavinl@ballardspahr.com</u>>; Swaminathan, Lisa B. <<u>SwaminathanL@ballardspahr.com</u>>; Tianna Mays <<u>tmays@lawyerscommittee.org</u>>; Woody Glass <<u>woody@wardglasslaw.com</u>>; Ferate, AJ <<u>AJFerate@spencerfane.com</u>>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <<u>sdavies@spencerfane.com</u>>

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

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Courtney:

Although we'd really appreciate receiving the responses today, if you anticipate that we won't receive the responses by Wednesday, August 17, would you please tell me when you're available for a meet-and-confer in the next couple days?

Best,

Jonathan



Jonathan M. Irwin

ASSOCIATE ATTORNEY

Phone: Email: (405) 360-9700 dd (405) 701-3604 jonathan@wardglasslaw.com

Website:

www.wardglasslaw.com

Address:

Ward & Glass, LLP | 1601 36th Avenue

NW | Norman, OK | 73072



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From: Babchinetskaya, Izabella < Babchinetskayal@ballardspahr.com>

Sent: Tuesday, August 16, 2022 8:20 AM

To: Powell, Courtney < cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason LeckermanJ@ballardspahr.com; Gavin, Laura gavinl@ballardspahr.com; Swaminathan, Lisa B. SwaminathanL@ballardspahr.com; Jonathan Irwin

<Jonathan@wardglasslaw.com</pre>; Tianna Mays <<pre>tmays@lawyerscommittee.org; Woody Glass

<woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>;

Davies, Shannon < sdavies@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

Last week, you indicated that you would send discovery responses by Monday, August 15th, a week past the agreed-upon extended deadline. Again, we have not received Defendants' discovery responses. Please let us know when we can expect them.

Thank you, Izabella

From: Babchinetskaya, Izabella (Phila) Sent: Friday, August 12, 2022 10:35 AM

To: 'Powell, Courtney' < cpowell@spencerfane.com > **Subject:** RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

We responded to your request for a two-week extension, and then also confirmed the two-week extension with AJ Ferate, which he then memorialized over email. Given the impending scheduling deadlines in this case, we don't have much wiggle room, but we are of course willing to extend courtesies as necessary. We look forward to receiving the responses this Monday.

Best, Izabella

From: Powell, Courtney < cpowell@spencerfane.com>

Sent: Thursday, August 11, 2022 5:06 PM

To: Babchinetskaya, Izabella (Phila) < Babchinetskayal@ballardspahr.com

Subject: Re: Hill et al. v. Town of Valley Brook, et al. - RFPs

↑ EXTERNAL

Izabella - I apologize for the delayed response. I've been away from my office. apparently, there was some confusion with our darkening as to whether the agreed extension was 2 to 3 weeks. I am working to finalize now and will have them to you by close of business on Monday. I appreciate your patience and I apologize for the miscommunication on our end.

Courtney Powell (Sent from iPhone)

Get Outlook for iOS

From: Babchinetskaya, Izabella < Babchinetskayal@ballardspahr.com

Sent: Wednesday, August 10, 2022 10:40:38 AM **To:** Powell, Courtney < cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason LeckermanJ@ballardspahr.com; Gavin, Laura gavinl@ballardspahr.com; Swaminathan, Lisa B. SwaminathanL@ballardspahr.com; Jonathan Irwin

<Jonathan@wardglasslaw.com</p>
; Tianna Mays <tmays@lawyerscommittee.org</p>
; Woody Glass

<woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>;

Davies, Shannon < sdavies@spencerfane.com >

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

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Hi Courtney,

The agreed-upon extended deadline for discovery responses was this Monday, August 8th. To date, we have not received any responses. Please let us know when we can expect them.

Thank you, Izabella

From: Babchinetskaya, Izabella (Phila) Sent: Monday, July 25, 2022 12:25 PM

To: 'Powell, Courtney' < cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason (Phila) LeckermanJ@ballardspahr.com; Gavin, Laura (Phila)

<gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <<u>SwaminathanL@ballardspahr.com</u>>; Jonathan Irwin
<<u>Jonathan@wardglasslaw.com</u>>; Tianna Mays <<u>tmays@lawyerscommittee.org</u>>; Woody Glass
<<u>woody@wardglasslaw.com</u>>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

We're very sorry to hear about your loss. Our condolences to you and your family. A two-week extension is fine.

Does Thursday at 2:00 EST work for a call about ESI? We're planning on including a member of our e-discovery team on the call. Please let us know who will join on your end, and we'll send around dial-in information.

Thanks, Izabella

From: Powell, Courtney < cpowell@spencerfane.com >

Sent: Monday, July 25, 2022 8:03 AM

To: Babchinetskaya, Izabella (Phila) < Babchinetskayal@ballardspahr.com

Cc: aago@lawyerscommittee.org; Leckerman, Jason (Phila) < LeckermanJ@ballardspahr.com; Gavin, Laura (Phila) < SwaminathanL@ballardspahr.com; Jonathan Irwin < Jonathan@wardglasslaw.com; Tianna Mays < tmays@lawyerscommittee.org; Woody Glass

<woody@wardglasslaw.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

↑ EXTERNAL

Izabella -

Good morning. I apologize for the delay in responding. My father-in-law passed away unexpectedly last week, and I have (will continue for the next few days) to be away from the office. To that end, could we have a two week extension to get the RFP responses to you?

I agree that it is a good idea to discuss production – I can be available any time on Thursday or Friday to discuss.

Thank you, Courtney

Courtney Powell Of Counsel Spencer Fane LLP

9400 N. Broadway Ext., Suite 600 | Oklahoma City, OK 73114 O 405.753.5915

cpowell@spencerfane.com | spencerfane.com

From: Babchinetskaya, Izabella < Babchinetskayal@ballardspahr.com >

Sent: Tuesday, July 19, 2022 10:04 AM

To: Lester, Andy <alester@spencerfane.com>; Ferate, AJ <AJFerate@spencerfane.com>; Davies, Shannon

<sdavies@spencerfane.com>; Powell, Courtney <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason LeckermanJ@ballardspahr.com; Gavin, Laura gavinl@ballardspahr.com; Jonathan Irwin

< <u>Jonathan@wardglasslaw.com</u> >; Tianna Mays < <u>tmays@lawyerscommittee.org</u> >; Woody Glass
< <u>woody@wardglasslaw.com</u> > Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al RFPs
Subject. [EXTENNAL] RETRINGER AT TOWN OF VAILEY BROOK, Et al KEPS
[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.
Hi all,
We had previously discussed meeting about ESI protocol. In anticipation of document production, do you have some time this week to discuss the protocol and document production?
Thank you, Izabella
From: Babchinetskaya, Izabella (Phila) Sent: Thursday, June 23, 2022 12:50 PM To: 'alester@spencerfane.com' <a in="" of="" sent="" t<="" td="" terms="" the="">
All,
Please see attached Plaintiffs' First Request for Production of Documents.
Thank you, zabella
Izabella Babchinetskaya 2021 Pro Bono Honor Roll – Gold
[X]
1735 Market Street, 51st Floor Philadelphia, PA 19103-7599 215.864.8315 DIRECT 215.864.8999 FAX
pabchinetskayai@ballardspahr.com PCARD
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